

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 19-CR-127

DONALD STENSON,

Defendant.

UNOPPOSED MOTION TO ADJOURN TRIAL

Donald Stenson moves this Court to remove from the Court's calendar the September 13, 2019, final pretrial conference, and the September 23, 2019, jury trial. As grounds for this motion, undersigned counsel states the following:

1. On July 15, 2019, Donald Stenson was arraigned on four counts alleging traveling in foreign commerce to engage in illicit sexual conduct with a minor, pursuant to 18 U.S.C. § 2423(c) and (e), and four counts alleging solicitation of a minor to engage in a commercial sex act, pursuant to 18 U.S.C. § 1591(a)(1), (b)(1) and 1596(a)(1). Stenson entered a not guilty plea, and Magistrate Judge David Jones detained pending trial. Mr. Stenson does not oppose this request.

2. With this indictment, Donald Stenson faces significant potential consequences including mandatory minimum sentences of 10 and 15 years on counts five through eight. Stenson has no previous criminal history

3. Stenson's defense counsel needs additional time for investigation and trial preparation. The indictment's allegations, that Stenson travelled overseas to engage and attempt to engage in illicit sexual conduct, and which alleges victims that live in the Philippines, pose significant barriers to investigation. At this point, undersigned counsel has represented Mr. Stenson for one week. He simply needs considerably more time to represent him adequately.

4. Undersigned counsel spoke with Assistant United States Attorney Megan Paulson earlier today, and Ms. Paulson stated that the government does not oppose the adjournment request.

For these reasons, Donald Stenson respectfully asks this Court to remove from the Court's calendar the September 13, 2019 final pretrial conference and the September 23, 2019 jury trial. Counsel suggests modifying the September 13 court appearance to a scheduling conference.

Dated at Milwaukee, Wisconsin, this 30th day of July, 2019.

Respectfully submitted,

/s/ John W. Campion

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